

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

**Civil Action No. 3:16-md-2738-
FLW-LHG
MDL No. 2738**

THIS DOCUMENT RELATES TO ALL CASES

**PROPOSED ORDER EXCLUDING THE OPINIONS OF
DEFENDANTS' EPIDEMIOLOGY EXPERTS KARLA BALLMAN PH.D.,
CHRISTIAN MERLO, M.D., MPH, GREGORY DIETTE, M.D., MHS, AND
JONATHAN BORAK, M.D., DABT**

THIS MATTER, having been opened to the Court by Plaintiffs for entry of an order excluding the opinions of Defendants' epidemiology experts Karla Ballman, Ph.D., Christian Merlo, M.D., MPH, Gregory Diette, M.D., MHS, and Jonathan Borak, M.D., DABT, and the Court having considered the submissions of the parties and having heard oral argument, and for good cause shown;

IT IS on this _____ day of _____, 2019,

ORDERED as follows:

1. Plaintiffs' Steering Committee's Motion to Exclude the Opinions of Defendants' Epidemiology Experts Karla Ballman, Ph.D., Christian Merlo, M.D., MPH, Gregory Diette, M.D., MHS, and Jonathan Borak, M.D., DABT is **GRANTED** in its entirety; and

2. Karla Ballman, Ph.D., Christian Merlo, M.D., MPH, Gregory Diette, M.D., MHS, and Jonathan Borak, M.D., DABT, experts for Defendants, shall be barred from offering their opinions.

Hon. Freda L. Wolfson